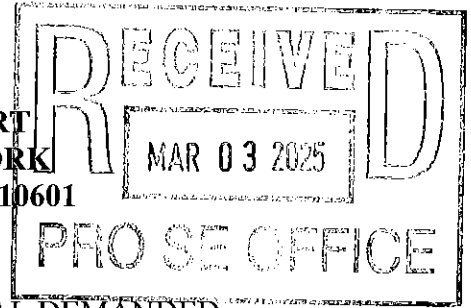


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
300 Quarropas Street, White Plains, NY 10601**



JEFFREY THOMAS PIRZINGER,
Plaintiff,

) JURY TRIAL DEMANDED
)
)

v.

) Civil Action No.
)
)

TRANSUNION LLC,
Defendant.

AFFIDAVIT IN SUPPORT OF THE COMPLAINT

STATE OF NEW YORK

COUNTY OF WESTCHESTER

I, Jeffrey Thomas Pirzinger, being duly sworn, depose and state under penalty of perjury:

1. I am the Plaintiff, proceeding pro se, residing at 135 Beechwood Dr, Mamaroneck, NY 10543. I have personal knowledge of the facts in the Complaint filed on or about February 28, 2025, against TransUnion LLC ("TransUnion").
2. This affidavit affirms the truth of the Complaint's factual allegations in Section IV (numbers 9-16), based on my personal knowledge and business records, including the FedEx proof-of-delivery attached as Exhibit A.
3. On January 2, 2025, I sent a written dispute to TransUnion via FedEx 2-Day Delivery (Tracking #771146841215), identifying 35 items in consumer report #450079572-043 I believe to be inaccurate, with a table listing each item, furnisher, account number, disputed information, and reason (e.g., "Payment not late"). I included consumer report #450079572-043, a utility bill, a passport, and a notarized acknowledgment. TransUnion

received it on January 6, 2025, per Exhibit A, signed by Y. Johnson at 555 West Adams St, Chicago, IL 60661.

4. On January 8, 2025, TransUnion sent me a letter stating my dispute was “illegible” or “undeterminable,” and it did not reinvestigate, address the 35 items, or provide results. As of February 28, 2025, no reinvestigation or results have been provided, despite the February 5, 2025, deadline under 15 U.S.C. § 1681i(a)(1)(A).
5. The following events relate to TransUnion’s actions regarding my credit report:
 - a. On December 3, 2024, before my dispute, a lender denied me a \$55,570 vehicle loan, citing adverse items in my TransUnion report which I later disputed.
 - b. On February 22, 2025, after TransUnion’s response, another lender denied me a \$95,865 vehicle loan, citing adverse items in the report.
 - c. I have relied on a vehicle with a failing engine, incurring repair costs and risks, per mechanic reports I possess.
 - d. I have experienced sleeplessness, anxiety, and humiliation from explaining credit issues to lenders and family.
6. I allege TransUnion’s failure to reinvestigate or correct the disputed items after my January 2, 2025, dispute allowed these inaccurate items to persist, contributing to the February 22, 2025, loan denial, my continued reliance on an unsafe vehicle, and my emotional distress.
7. I reserve the right to supplement this affidavit with additional records (e.g., lender letters, mechanic reports) as needed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 28th day of February, 2025, in New York.

by [Signature]
Signature
Jeffrey Thomas Pirzinger
135 Beechwood Dr
Mamaroneck, NY 10543
T: (914) 497-1104

2/28/2025
Date

NOTARY ACKNOWLEDGMENT

State of New York)

County of Westchester)

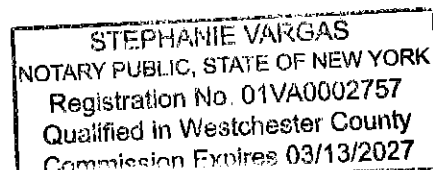
On this 28th day of February, 2025, before me, the undersigned, a Notary Public in and for the State of New York, personally appeared Jeffrey Thomas Pirzinger, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and acknowledged to me that they executed the same in this capacity, and that by his signature on the instrument, the individual executed the instrument.

Notary Public Signature: [Signature]

Printed Name: Stephanie Vargas

My Commission Expires: 3/13/2027

Notary Public Registration Number: 01VA0002757



AFFIDAVIT IN SUPPORT OF THE COMPLAINT

Exhibit A



January 14, 2025

Dear Customer,

The following is the proof-of-delivery for tracking number: 771146841215

Delivery Information:

Status:	Delivered	Delivered To:	Receptionist/Front Desk
Signed for by:	Y.JOHNSON	Delivery Location:	555 W ADAMS ST
Service type:	FedEx 2Day		
Special Handling:	Deliver Weekday		CHICAGO, IL, 60661
		Delivery date:	Jan 6, 2025 12:44

Shipping Information:

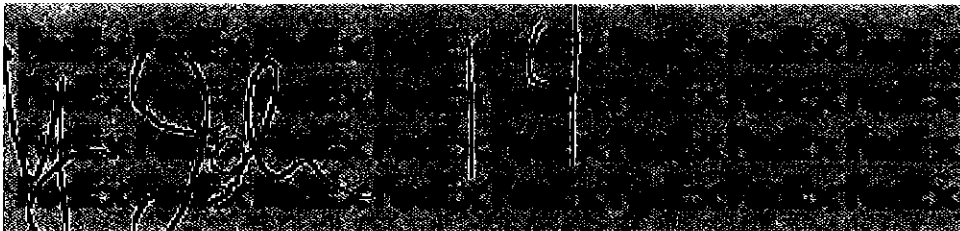
Tracking number:	771146841215	Ship Date:	Jan 2, 2025
		Weight:	0.5 LB/0.23 KG

Recipient:
DISPUTE DEPARTMENT, TRANSUNION LLC
555 W ADAMS ST
CHICAGO, IL, US, 60661

Shipper:
Jeffrey Thomas Pirzinger,
135 Beechwood Drive
Mamaroneck, NY, US, 10543

Reference

35 DISPUTED INACCURATE ITEMS OF INFORMATION



Thank you for choosing FedEx